

### REMARKS / ARGUMENTS

Claim 25 has been objected to. Consequently, claim 25 has been amended so as to remove the extra “,” (the extra comma), per the Examiner’s objection. Accordingly, Applicant deems that the objection is overcome.

Claims 1-14 have been rejected under 35 USC 102(b) as being anticipated by Bradley et al. (US 6,584, 507 B1) (“Bradley”). Regarding claim 1, the examiner asserts that all four elements of claim 1 are taught by Bradley. In fact, none of the four elements of claim 1 are taught, suggested, or motivated by Bradley.

In particular, Bradley is silent on the first element of herein-amended claim 1, i.e., Bradley does not teach “acquiring a first specification that **describes** a set of hierarchical interrelationships among said set of entities, the first specification being for constructing the tree-style graphical representation”. The Examiner cites col. 3, lines 4-14, which merely describes a “connection data file” that (1) “ensures compatibility between the application program and the network management system” [this does **not** describe a set of hierarchical interrelationships], and that (2) “defines one or more application menu options of the application program [this does **not** describe a set of hierarchical interrelationships] and one or more **locations** within the hierarchical list of the network management system into which the application menu options are to be

stored" " [and this does **not** describe a set of hierarchical interrelationships, merely a set of locations – knowing only the locations would not enable one to construct the hierarchical list, i.e., a tree-style graphical representation]. Here, the "connection data file" does not "describe a set of hierarchical interrelationships", as required by claim 1. Each "location" merely provides information about the relation of the "location" to the root of the hierarchy tree, but **not** complete information about the entire hierarchy tree. Even a set of "locations" does not necessarily provide complete information about the entire hierarchy tree. Further, the connection data file **requires** a pre-existing "hierarchical list of the network management system" so that the "one or more application menu items" that are defined can be stored into the pre-existing one or more locations within the pre-existing "hierarchical list of the network management system". Therefore, the "connection data file" is NOT a "first specification that describes a set of hierarchical interrelationships among a set of entities, the first specification being for constructing the tree-style graphical representation", as required by the first element of amended claim 1.

The Examiner also cites col. 9, line 51 through col. 10, line 55, which describes elements 205, and elements 216a – 216e of Fig. 2A. Fig. 2A and the related cited text merely shows and describes the contents 216a - 216e of the "management connection folder" 205, stating that the folder 205 contains sub-folders 216a – 216e. Fig. 2A merely shows the **display** of a hierarchy of folders, without providing "a first **specification** that **describes** a set of hierarchical

interrelationships among said set of entities", as required by the first element of claim 1.

Bradley is entirely silent on teaching the second element of amended claim 1, i.e., "acquiring a second specification that describes a set of **non-hierarchical** interrelationships among said set of entities, the second specification being for constructing the tree-style graphical representation". The Examiner cites elements 208 and 203 of Figs. 2A-2B, yet these elements are merely explained as being the **hierarchical** control tree 203 and one of the "sub-options" 208 of the tree 203 (col. 9, lines 59-67). By contrast, Applicants teach a cooperation of hierarchical and **non-hierarchical** relationships, as shown in Fig. 3A of the Specification. For example, entities of the hierarchical tree of Applicant's invention are also inter-related by data-flow relationships that are **not** hierarchical, as shown in Fig. 2, and as explained at the bottom of page, 2, and as shown in Fig. 3, and as explained at the top of page 6 of the Specification, for example. By contrast, Bradley does not describe or show data flow relationships among hierarchically-related entities, or any other cooperative non-hierarchical relationships among hierarchically-related entities, and so **cannot** teach "acquiring a second specification that describes a set of **non-hierarchical** interrelationships among said set of entities, the second specification being for constructing the tree-style graphical representation" as required by the second element of amended claim 1. Thus, Bradley does not teach, suggest, or motivate the second element of claim 1.

Bradley is silent on the third element of amended claim 1. The third element now requires "constructing said tree-style graphical representation simultaneously representing **both** said set of hierarchical interrelationships and said set of non-hierarchical interrelationships among said set of entities". The Examiner cites Figs. 2A and 2B, and 5A and 5B to illustrate that Bradley teaches this third element. However, it has been established that Fig. 2A fails to show any non-hierarchical relationships among the elements. Further, Fig. 2B is essentially the same as Fig. 2A, and fails for the same reasons to show non-hierarchical elements. Moreover, Figs. 5A and 5B also do not show, suggest, or motivate any non-hierarchical relationship among the elements shown. Window 505 merely shows the further hierarchical contents of the application link 504. There are no non-hierarchical interconnections among any of the elements shown in Fig. 5A, and Fig. 5B also only shows hierarchical relationships, and NOT non-hierarchical relationships among the elements. Thus, Bradley fails to teach the third element of amended claim 1.

Bradley is also silent on the fourth element of claim 1, i.e., "displaying said tree-style graphical representation to produce said graphical user interface on said screen of said visual display unit". The Examiner again cites Figs. 2A, 2B, 5A, and 5B. Nevertheless, since it has been shown that Bradley does not teach, suggest, or motivate non-hierarchical relationships among elements, and therefore cannot teach the cooperation of both hierarchical and non-hierarchical interrelationships among elements needed to construct the tree-style graphical

representation, Bradley cannot teach displaying the tree-style graphical representation. By being entirely silent on non-hierarchical relationships, Bradley is teaching away from such relationships. Thus, Bradley fails to teach, suggest, or motivate the fourth element of amended claim 1.

Consequently, since Bradley is silent on each of the four elements of amended claim 1, the rejection of amended claim 1 under 35 USC 102(b) is deemed to be overcome.

Regarding claim 2, the Examiner asserts that the first element of claim 2, i.e., "extracting said first specification from a digital file stored on a computer-readable medium" is taught at col. 6, lines 41-67, and at Figs. 2A-2B. Yet, "said first specification" [that describes a set of hierarchical relationships among a set of entities] is not mentioned at all in Bradley in the cited lines and figures. For example, Bradley states that "the web server 112 may comprise a certification status page 114, a Phase I Page 115, and a Certified-Published Connection Page 117." None of these pages includes information about a hierarchical structure of entities that are also related in a non-hierarchical way, as required by claim 2, which depends from amended claim 1.

Figs. 2A and 2B again merely show a menu hierarchy, e.g., showing the functions 216a – 216e available in the "Management Connection" folder 205 in Fig. 2A, and showing the functions 222 and 224 available in the "Management Connection Certification" folder 220 in Fig. 2B. Note well that there are no non-

hierarchical relationships shown or described relating to Figs. 2A and 2B. Thus, the first element of claim 2 is absent from Bradley.

Regarding the second element, i.e., "obtaining said first specification from an interactive graphical user interface", this is necessarily absent from Bradley since "said first specification" is absent from Bradley, as explained above. Also, note well that Figs. 2A and 2B do not show a user interface for "obtaining said first specification", instead being for creating a connection between a network management system and a 3<sup>rd</sup>-party application (col. 9, lines 37-38). Although a "control tree 203" is shown, the specification of this hierarchical structure 203 is never obtained or provided by the interactive graphical use interface taught by Bradley, in Figs 2A and 2B, or anywhere else in Bradley.

Since both the first and second elements are absent from Bradley, the rejection of claim 2 is deemed to be overcome.

Regarding claim 3, since Bradley is silent on a "second specification" of a set of non-hierarchical relationships, then it follows that Bradley must be also be silent on "extracting said second specification from a digital file stored on a computer-readable medium; and obtaining said second specification from an interactive graphical user interface", as required by claim 3. Thus, the rejection of claim 3 is deemed to be overcome.

Regarding claim 4, as stated above, Bradley clearly is silent on teaching, suggesting, or motivating any form of "non-hierarchical relationships among the entities, such as those entities shown in Figs. 2A and 2B. Consequently, Bradley must be silent also on "incorporating said set of non-hierarchical interrelationships into said initial tree-style graphical representation, by depicting said set of non-hierarchical interrelationships without altering said set of hierarchical interrelationships depicted in said initial tree-style graphical representation, to produce said tree-style graphical representation", as required by claim 4. Moreover, claim 4 depends from claim 1, which is deemed to be allowable. Accordingly, the rejection of claim 4 is deemed to be overcome.

Regarding claim 5, claim 5 depends from claim 4, which is deemed to be allowable. Accordingly, the rejection of claim 5 is deemed to be overcome.

Regarding claim 7, each element of amended claim 7 now includes a specific reference to depicting "simultaneously hierarchical **and** non-hierarchical interrelationships among a set of entities". Since it has been established that Bradley is silent on depicting a tree-style graphical representation that depicts simultaneously hierarchical and **non-hierarchical** interrelationships among a set of entities, it is clear that both elements of claim 7 are absent from the teaching of Bradley. In particular, Bradley is silent at the cited Figs. 3A-E, and col. 10, lines

1-9, cited by the Examiner. Accordingly, the rejection of claim 7 is deemed to be overcome.

Regarding claim 8, the Examiner cites col. 10, lines 25 – 40 which relates to creating a “connection file”, not a new entity in the hierarchical structure as shown in Figs. 2A and 2B. As stated in Bradley at col. 6, lines 36-40, “a 3<sup>rd</sup>-party application is made accessible using a ‘connection file’ that associates the 3<sup>rd</sup>-party application with the principal network management system. Each connection file is created by either a 3<sup>rd</sup>-party application developer or the customer at their respective sites.” A “connection file” is not **part** of the hierarchical structure (the control tree 203, col. 10, lines 1-9)), but is created **using** the hierarchical structure. Thus, no “new entity” is defined in Bradley, as required by the first element of claim 8.

Further, since there is no “new entity”, there is no “position in said tree-style graphical representation where said **new entity** can be inserted”. Thus, Bradley is silent on the second element of claim 8. Moreover, for analogous reasons, the third and fourth elements are also absent. In addition, claim 8 depends from claim 7 which has been deemed allowable. Consequently, the rejection of claim 8 is deemed to be overcome.

Regarding claim 9, Bradley fails to teach deleting of an entity in the hierarchical structure. Although the Examiner cites the “Updater” at col. 21, lines



16-64, and the "Delete Option at col. 22, lines 61-67, these citations refer merely to operations on the usual connection files. For example, "the Global Connection File Updater carries out updating of all installed and certified connection files at one of the Customer Installations 100". Connection files are not part of the hierarchical structure of Figs. 2A and 2B, for example. In fact, there is no teaching in Bradley that relates to changing the hierarchical structure in any way. Moreover, claim 9 depends from claim 7, already deemed to be allowable. Consequently, the rejection of claim 9 is deemed to be overcome.

Regarding claim 10, as stated above regarding claims 7-9, Bradley fails to teach any modification of the hierarchical structure, instead teaching irrelevant operations upon the "connection files". Further, Bradley is entirely silent on any non-hierarchical relationships, as explained above. Consequently, Bradley cannot teach all three of the elements of amended claim 10, each of which requires depicting "simultaneously hierarchical and non-hierarchical interrelationships among a set of entities". Accordingly, the rejection of claim 10 is deemed to be overcome.

Regarding claim 11, since the rejection is based on a rationale similar to the rejection of claim 8, see the response to the rejection of claim 8. Accordingly, the rejection of claim 11 is deemed to be overcome.

Regarding claims 12 and 13, since the rejection is based on a rationale similar to the rejection of claim 9, see the response to the rejection of claim 9. Accordingly, the rejection of claims 12 and 13 is deemed to be overcome.

Regarding claim 14, Bradley fails to teach any modification of the hierarchical structure, instead teaching irrelevant operations upon the "connection files". Further, Bradley is entirely silent on any non-hierarchical relationships, as explained above. Consequently, Bradley cannot teach all three of the elements of claim 14, each of which requires a "depicted non-hierarchical interrelationship". Bradley fails to show any "depicted non-hierarchical interrelationship". Accordingly, the rejection of claim 14 is deemed to be overcome.

Regarding claims 15 and 16, since the rejection is based on a rationale similar to the rejection of claim 9, see the response to the rejection of claim 9. Accordingly, the rejection of claims 15 and 16 is deemed to be overcome.

Regarding claim 17, Bradley fails to teach any modification of the hierarchical structure, as shown in Figs. 2A and 2B, for example, instead teaching irrelevant operations upon the "connection files". Further, Bradley is entirely silent on any non-hierarchical relationships, as explained above.

Consequently, Bradley cannot teach three of the elements of claim 17, each of which requires a "depicted non-hierarchical interrelationship". Bradley fails to show any "depicted non-hierarchical interrelationship". Accordingly, the rejection of claim 17 is deemed to be overcome.

Regarding claim 18, Bradley fails to teach any modification of the hierarchical structure, as shown in Figs. 2A and 2B, and in Figs. 5A and 5B, for example, instead teaching irrelevant operations upon the "connection files". Further, claim 18 depends from claims 2 and 11, which are both deemed to be allowable. Accordingly, the rejection of claim 18 is deemed to be overcome.

Regarding claim 19, it is deemed to be allowable based on reasoning similar to the arguments presented for the allowability of claim 1. Thus, the rejection of claim 19 is deemed to be overcome.

Regarding claims 20-23, the arguments regarding claims 1, 7, 10, and 14 apply. Thus, the rejection of claims 20-23 is deemed to be overcome.

Regarding claims 24-26, the arguments regarding claims 1, 2, and 13 apply. Thus, the rejection of claims 24-26 is deemed to be overcome.

Claim 6 has been rejected under 35 USC 103(a) as being unpatentable over Bradley in view of Dong et al. (US 6,380,937 B1) ("Dong"). The Examiner cites Figures 3-5 of Dong, and the supporting text at col. 4, line 59 through col. 5 line 40. It's clear from looking at Figs. 3-5, and it is confirmed from the text at col. 4, line 63, that Dong merely teaches "hierarchical tree connectors 54", **not the non-hierarchical** connectors as shown in Fig. 3 of Applicant's Specification, and required by claim 6. All the relationships in Dong are hierarchical, whereas Applicant teaches and claims a simultaneous depiction and cooperation of hierarchical and non-hierarchical relationships. Bradley only teaches **hierarchical** relationships, and Dong only teaches **hierarchical** relationships. Thus, Dong fails to remedy the deficiency of Bradley. Thus, combining Bradley and Dong would not result in Applicant's invention. Consequently, the rejection of claim 6 is deemed to be overcome.

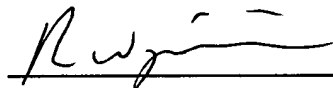
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The prior art made of record and not relied upon does not appear to present an impediment to the allowance of the present application.

Accordingly, Applicants assert that the present application is in condition for allowance, and such action is respectfully requested. The Examiner is invited to phone the undersigned attorney to further the prosecution of the present application.

Respectfully Submitted,

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